

Exhibit 6

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March 17, 2022

Via Electronic Mail

Steven J. Kaiser
Cleary Gottlieb Steen & Hamilton LLP
2112 Pennsylvania Avenue, NW
Washington, DC 20037
skaiser@cgsh.com

**Re: *Jones v. Varsity Brands LLC,*
 No. 2:20-cv-02892-SHL-tmp (W.D. Tenn.)**

Dear Steven:

I write to memorialize our telephone conversation on March 15, 2022.

Text Messages

You stated that Varsity has produced text messages collected from Bill Seely, John Sadlow, Buffy Duhon, and Melanie Berry. I said that Plaintiffs have not been able to locate the texts. As I requested yesterday in following up on our call, please provide Bates numbers for the text messages no later than March 18, 2022.

Camps Data

You stated that Varsity has produced structured data relating to Varsity camps. I said that Plaintiffs have not been able to locate this data. As I requested yesterday in following up on our call, please provide Bates numbers for the structured data relating to Varsity camps no later than March 18, 2022.

Substantial Completion

You stated that Varsity has substantially completed production of and does not intend to produce any more documents responsive to Plaintiffs First Requests for Production, notwithstanding Plaintiffs' requests for

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text messages and Camps Data.

Plaintiffs' Second Requests for Production

You stated that Varsity will stand on its objections to Plaintiffs' Second Requests for Production and will not be producing any responsive documents.

Plaintiffs' First Interrogatories

Interrogatory No. 12

You stated that Varsity covered certain expenses for USASF, though you would not specify whether Varsity made a loan to USASF, extended a credit facility, or simply paid USASF's bills and salaries. You refused to provide any further details about the nature of the financial relationship between Varsity and NFHS, AACCA, ICU, USASF, or USA Cheer, despite the fact that Interrogatory No. 12 seeks this and other information.

Interrogatory No. 13

You stated that Varsity will provide the titles and dates held by Bill Seely at USA Cheer and Jim Lord at AACCA.

Interrogatory No. 14

You stated that Varsity cannot provide information regarding market share for Varsity and its competitors. You said that you have sales information about Varsity and other market participants but that such information is not reliable.

Interrogatory Nos. 18 & 19

You said Varsity will stand on its objections.

Number of Depositions for Bain and Charlesbank

I stated Plaintiffs' position that 20 total depositions for Bain and Charlesbank is reasonable in light of their ownership and control of Varsity and their significant roles in setting policy for Varsity. In an attempt to reach a reasonable accommodation, I asked whether Varsity would accept a total of 14 depositions of Bain and Charlesbank, to be

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allocated as Plaintiffs see fit, inclusive of any 30(b)(6) depositions. You described Plaintiffs' offer as "ridiculous," and said Varsity would not agree to 14 depositions.

Plaintiffs reserve all right regarding the issues described above. I am available for further discussions.

Sincerely,

/s/ Kevin E. Rayhill

Kevin E. Rayhill

cc: Matthew Mulqueen
Joseph Saveri
Ronnie Spiegel